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December 5, 2017

VIA ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 12B
New York, NY 10007

Re: *LEGO Juris A/S et al. v. Egrandbuy, Inc.*, Case No. 1:16-cv-06439-JGK

Dear Judge Koeltl:

We represent Plaintiffs LEGO Juris A/S and Warner Bros. Home Entertainment Inc. ("WBHEI") (together, "Plaintiffs") in the above-referenced action. Plaintiffs brought this case for a declaratory judgment of non-infringement and cancellation of several of Defendant Egrandbuy, Inc.'s ("Defendant") trademark registrations. In response, Defendant counterclaimed for trademark infringement. Pursuant to Section 2.B of Your Honor's Individual Practices, we write to respectfully request leave to file a motion for summary judgment or, in the alternative, a pre-motion conference with the Court.

Pursuant to the Amended Scheduling Order, filed September 28, 2017 (Dkt. No. 44) (the "Scheduling Order"), "[m]otions for summary judgment shall be served by December 18, 2017, with oppositions thereto due January 8, 2018, and replies, if any, due January 19, 2018." Plaintiffs intend to move for summary judgment on: (1) Plaintiffs' claims for (a) a declaratory judgment of non-infringement and (b) cancellation of certain of Defendant's trademark registrations due to fraud and non-use; and (2) Defendant's claims for trademark infringement. Plaintiffs seek confirmation from the Court that they may file their motion for summary judgment by December 18, 2017 pursuant to the Scheduling Order notwithstanding the pre-motion conference requirement of Section 2.B of Your Honor's Individual Practices or, in the alternative, request a pre-motion conference with the Court.

We thank the Court for its consideration of this request.

Sincerely,

DORSEY & WHITNEY LLP

/s/ Robert M. Wasnofski, Jr.
Robert M. Wasnofski, Jr.



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